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Honorable Timothy W. Dore
CHAPTER 13
Hearing Date: October 5, 2016
Hearing Time: 9:30 a.m.
Response Date: September 28, 2016

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

IN RE:

TOWNSEND, Mary Elizabeth,

Debtor.

No. 15-13150

**DEBTOR'S RESPONSE TO
TRUSTEE'S MOTION TO DISMISS
and PROOF OF SERVICE**

COMES NOW, the Debtor, by and through her attorney, Travis A. Gagnier, and responds to the Trustee's Motion to Dismiss.

Debtor fell behind on her plan payments. Debtor remitted a payment of \$1,600.00, which was posted by the Chapter 13 Trustee on or about September 26, 2016. Furthermore, Debtors intends to maintain her plan payments in an effort to successfully complete her Chapter 13 Plan.

For this reason the debtor asks that the motion to dismiss be denied, or in the alternative, an agreed order entered into for ongoing payments effective October 2016.

Respectfully submitted this 27th day of September 2016.

/s/ Travis A. Gagnier
Travis A. Gagnier, #26379
Attorney for Debtor

RESPONSE TO MOTION TO DISMISS- 1

TRAVIS A. GAGNIER
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1 I declare under penalty of perjury under the laws of the State of Washington that I filed the original of the
2 foregoing with the United States Bankruptcy Court in Seattle and served a true copy thereof to:

3 K. Michael Fitzgerald
4 Chapter 13 Trustee

Honorable Timothy W. Dore

US Trustee

5 via ECF, and to:

6 Debtor

7 via U.S. first-class mail, postage pre-paid, on the 28th day of September 2016.
8

9 /s/ Shari L. Moody

10 Shari L. Moody

11 Assistant to Travis A. Gagnier
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28 RESPONSE TO MOTION TO DISMISS- 2

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